

The cited prior art does not anticipate or render obvious the claims of the present invention. The '790 patent for instance, relates to a system for delivery of portable documents to a server. Unlike the present invention, the '790 patent fails to disclose, teach or suggest the use of a proofer identifier, version numbers or retrieving and formatting for simultaneous display various versions of the document as required by all the claims. Likewise, the '702 patent fails to disclose, teach or suggest providing portable document file formats, assigning version numbers, or retrieving and formatting for simultaneous display various versions of the document as required by all the claims. Therefore, neither the '790 patent nor the '702 patent anticipate or render obvious any claim of the present invention.

The '592 patent also does not anticipate or render obvious the claims of the present invention. For instance, the '592 patent fails to disclose, teach or suggest providing portable document file formats, a proofer identifier, or retrieving and formatting for simultaneous display various versions of the document as required by all the claims. The '592 patent is not directed toward a group publishing system, but rather is generally directed to a system for displaying various version information of any type of file and/or program in a hierarchical display. (Col. 1, lines 13-15; Col. 4, lines 35-42) Therefore, the '592 patent does not anticipate or render obvious any claim of the present invention.

The '661 patent cited by the Examiner relating to simultaneous display of various versions of a document also does not anticipate or render obvious any claim of the present invention. For example, the '661 patent does not disclose, teach or suggest portable document file formats, a proofer identifier, or receiving a request from a proofer to a program for retrieving and formatting for simultaneous display various versions of the document as required by all the claims. Further, the '661 patent is not directed to a group publishing system but generally to display of data files. (Col. 2, lines 5-6 and 31-32) Therefore, the '661 patent does not anticipate or render obvious any claim of the present invention.

Finally, Adobe Acrobat 3.0 does not anticipate or render obvious the claims of the present invention. For instance, Adobe Acrobat 3.0 fails to disclose, teach or suggest the use of a proofer identifier, version numbers or retrieving and formatting for simultaneous display various versions of the document as required by all the claims. Rather, Adobe Acrobat 3.0 is related to PDF formats. Therefore, Adobe Acrobat 3.0 does not anticipate or render obvious any claim of the present invention.

Moreover, Applicant respectfully submits that the above-listed references are not properly combined in order to formulate an obviousness rejection. There is no suggestion to combine the cited prior art and in fact, the references themselves teach away from combination.

For instance, Applicant respectfully disagrees with the Examiner's suggestion that the '790 patent and the '702 patent are properly combined because both relate to the field of document processing. The '790 patent relates to a delivery system and has nothing to do with a collaborative group publishing system where documents may be edited and various versions kept for simultaneous display. Applicant further respectfully disagrees with the Examiner's suggestion that it is proper to combine the '592 patent with the '661 patent because they are both related to editing documents and providing various versions for display. As noted, the '661 patent is directed toward display of data files whereas the '592 patent is directed toward keeping track of both data files and programs.

The Examiner has also suggested that it is proper to combine the '702 patent with both the '790 patent and Adobe Acrobat 3.0. There is not suggestion in any of these references to combine them. In fact, the various patents themselves teach against the combination suggested by the Examiner. For instance, one of the stated objects of the '702 patent is "the provision of: An Internet-based word-processing and editing GPS for documents ... that is HTML-based and allows audio and video to be embedded in the text itself." (Col. 5, lines 24-26 & 28-30) Another stated object of the '702 patent is "the provision of: ... An HTML-based word-processing system that allows instant downloading

of text to existing pre-press formats, such as Quark or Pagemaker, and uploading of pictures, graphics, video or audio data in any format." (Col. 5, lines 24 & 36-39) The '702 patent further states, "A further object of the present invention is to provide a method to allow essentially simultaneous viewing of an entire in-process document, which can be downloaded for publication in a variety of formats, including but not limited to CD-ROM, hard-copy book, or on-line HTML format." (Col. 5, lines 19-23) These stated objectives of the '702 patent cannot be achieved when combined with either or both the '790 patent and/or Adobe Acrobat 3.0 as the Examiner has suggests. For instance, combining the Exchange feature of Adobe Acrobat 3.0 and the '790 patent (which utilizes a portable format) with the '702 patent would not allow audio and video to be embedded in the text itself, and all the claims of the present invention require PDF format, not a variety of formats. In addition, one of the objects of the '702 patent states that "[m]ultiple user can simultaneously work on the same project." (Col. 5, line 4) However, because all of the claims of the present invention require the use of PDF format, which is an image file, users do not "simultaneously work on the same project" and "simultaneous viewing of an entire in-process document" does not happen. Therefore, not only is there no motivation to combine the '702 patent with Adobe Acrobat 3.0 and the '790 patent, due to the stated objects of the invention in the '702 patent, these references specifically teach away from the suggested combination. Therefore, combination of the '702 patent with either or both the Adobe Acrobat 3.0 and/or the '790 patent is not proper because the stated objects of the invention for these references are incompatible and mutually exclusive.

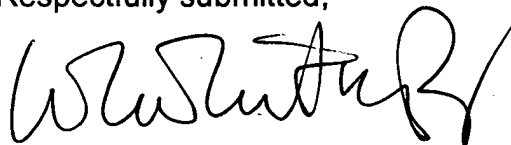
Applicant respectfully submits that there is no motivation in any of the cited references to combine them as the Examiner has suggested and in fact, the references themselves teach away from the suggested combination.

Even if the '702 patent were combined with the Adobe Acrobat 3.0 or the '790 patent despite the lack of motivation to do so and the fact that the combination is actually taught against by the references themselves, an individual would not arrive at a system which renders obvious the claims of the present application. For instance,

one is taught by the objects stated in the '702 patent that it is desirable to embed audio and video in the text itself. Thus, an individual would be taught to create a group publishing system for displaying, modifying and embedding directly into a file or document; video and/or audio data in many differing and varied formats for presentation. (Col. 5, lines 38-42 & 50-55) This, however, would be a vastly different system from the claimed invention, of which all the claims require utilization of a PDF format. Alternatively, combination of the '592 patent with the '790 patent or Adobe Acrobat 3.0 would likewise result in a system in which various versions of programs are displayed and maintained in PDF format, which would render programs maintained in that format inoperable. Because there are a number of different systems that may be arrived at if the above-cited references were combined as the Examiner is suggesting, many if not all of which would not render obvious the present invention as claimed, Applicant respectfully submits that the Examiner's rejection is improper. Moreover, even if the present invention as claimed could somehow be pieced together from various element of the five cited references, it would be necessary to utilize the claimed present invention as a road map in order to do so, particularly in light of the fact that the references themselves teach away from such a combination.

It is respectfully submitted that claims 1-17 and 19-22, all of the claims remaining in the application, are in order for allowance, and early notice to that effect is respectfully requested.

Respectfully submitted,



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Wesley W. Whitmyer, Jr., Registration No. 33,558  
Attorney for Applicants  
ST.ONGE STEWARD JOHNSTON & REENS LLC  
986 Bedford Street  
Stamford, CT 06905-5619  
203 324-6155